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## **CATHOLIC SAFEGUARDING STANDARDS AGENCY**

# **Executive Summary of The Catholic Diocese of Plymouth Baseline Audit Report July 2024**

## Contents

1. Introduction.....	3
2. Audit Grading .....	4
3. Summary of overall findings .....	5
4. Recommendations .....	11
5. Arrangements for Follow-up.....	12

## 1. Introduction

**1.1** This is an executive summary of the baseline safeguarding audit report for the Catholic Diocese of Plymouth. The audit was undertaken in April and May 2024, in accordance with the contractual agreement between the diocese and the CSSA. Trustees of the Diocesan charity have been provided with a full version of this report.

**1.2** The audit is based on information drawn from a number of sources, including:

- A self-assessment and supporting evidence provided by the Diocese of Plymouth;
- Case audits of individual safeguarding cases and lower-level concerns from the last 12 months;
- Individual and small-group interviews with key Diocesan personnel;
- Online surveys of clergy and Parish Safeguarding Representatives (PSR); and
- Focus groups with clergy and PSRs

**1.3** The Catholic Diocese of Plymouth was founded in 1851. It comprises the whole of Devon and Cornwall and part of Dorset. There have been nine Bishops of Plymouth with the last being the Most Rev. Mark O'Toole who served until 21<sup>st</sup> June 2022 when he was installed as the Archbishop of Cardiff. Canon Paul Cummins is currently serving as the Diocesan Administrator, alongside his role as a Parish Priest, until the installation of a new Bishop<sup>1</sup>.

**1.4** The Safeguarding team is based at St Boniface House in Ashburton alongside other Diocesan departments. The team consists of the Safeguarding Coordinator, three Safeguarding Caseworkers and two Safeguarding Administrators. All staff in the team work on a part time basis.

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<sup>1</sup> On 13<sup>th</sup> September 2024 His Holiness Pope Francis appointed Bishop Philip Moger as the new Bishop of Plymouth

## 2. Audit Grading

**2.1** Practice was assessed against the eight Safeguarding standards adopted by the Catholic Church in England and Wales<sup>2</sup>, and graded in accordance with the CSSA Maturity Matrix for dioceses. Each standard is graded on an ascending seven point scale of Below Basic, Basic, Early Progress, Firm Progress, Results Being Achieved, Comprehensive Assurance, and Exemplary. Grades for individual standards are combined to produce an overall grading.

OVERALL GRADING	Results Being Achieved
Standard 1 - Safeguarding is embedded in the Church body's leadership, governance, ministry and culture	Results Being Achieved
Standard 2 - Communicating the Church's Safeguarding Message	Results Being Achieved
Standard 3 - Engaging with and Caring for those who report having been harmed	Comprehensive Assurance
Standard 4 - Effective Management of Allegations and Concerns	Results Being Achieved
Standard 5 - Management and Support of Subjects of Allegations and Concerns (respondents)	Results Being Achieved
Standard 6 - Robust Human Resource Management	Results Being Achieved
Standard 7 - Training and Support for Safeguarding	Results Being Achieved
Standard 8 - Quality Assurance and Continuous Improvement	Results Being Achieved

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<sup>2</sup> Full details of the eight standards are available here [The Eight National Safeguarding Standards \(catholicsafeguarding.org.uk\)](https://catholicsafeguarding.org.uk)

### 3. Summary of overall findings

**3.1** This CSSA audit assessed the Safeguarding practice in The Catholic Diocese of Plymouth over the last 12 months. Safeguarding issues that arose prior to this have only been considered if they influence current practice and procedure. The Diocese has received an overall grading of Results Being Achieved against seven of the eight Safeguarding Standards of the Catholic Church in England and Wales and as an overall rating. Standard 3 received the higher grading of Comprehensive Assurance.

**3.2** The Diocesan commitment to Safeguarding has resulted in it becoming part of the culture of the Diocese for clergy, employed staff and volunteers with promotion of the fact that Safeguarding is everybody's responsibility. Particular investment has been made in engaging with and supporting Survivors as one of the four strategic priorities of their established, regularly reviewed and publicly available Safeguarding Implementation Plan (SIP). There is an unambiguous training expectation in Safeguarding at all levels, including regular input for clergy on the Pastoral standards document, *Caring Safely for Others*<sup>3</sup>. All Parishes and Worshipping Communities are expected to have a Parish Safeguarding Representative and to display a Diocese of Plymouth Safeguarding Poster in a public place. The Diocese also supports developments in practice at a national level with the Safeguarding Coordinator being part of a group working with the CSSA to develop an improved risk assessment tool.

**3.3** Plymouth Diocese has not had a Bishop since June 2022. This is outside Diocesan control but, despite the widely respected work of the Diocesan Administrator, does have an impact. This is particularly seen in proposed new developments, such as a Chaplaincy for Survivors, which requires the support of an installed Bishop to progress. Although it was apparent in the evidence provided for this audit that the Diocese take a zero tolerance approach to abuse this was not overtly stated on the Safeguarding section of the website, which is otherwise an excellent resource. The Diocesan SIP does not offer a direct correlation with the

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<sup>3</sup> [Caring-Safely-For-Others.pdf \(cbcew.org.uk\)](https://www.cbcew.org.uk/Caring-Safely-For-Others.pdf)

eight Safeguarding Standards of the Catholic church in England and Wales. Senior leaders may wish to reassure themselves that the four strategic priorities of the SIP will offer practice improvements across all eight national Safeguarding standards. Formalising mechanisms to ensure learning at all levels in the Diocese from allegations, concerns and complaints will ensure that developments in practice would remain robust in the event of any staffing changes.

**3.4** To ensure that Safeguarding communications are effective Trustees approved a Safeguarding Communication Strategy in Jan 2024. In addition, one of the staff in the Safeguarding office has a lead for communications. Messages are distributed via a variety of means including posters in Parishes, on the Diocesan website, on social media and via Ad Clerum to clergy from the Diocesan Administrator. Relevant events, such as LOUDFence<sup>4</sup>, are also held and promoted. PSRs and clergy indicated that they considered that communications from the Safeguarding team were regular and effective. Collaboration with other church bodies, such as the South West Ecumenical Safeguarding Forum, and external organisations, like First Light<sup>5</sup>, to promote a safer environment is also strong.

**3.5** When the Communication Strategy is reviewed after 12 months it will be important to gain feedback from key stakeholders including PSRs and Survivors to ensure that messaging is effective and to identify where improvements may need to be made. Clear messaging from a senior member of clergy, even in the absence of a Bishop, on the Diocesan website in support of Safeguarding and a zero tolerance approach to abuse will demonstrate that senior leaders are supportive of and communicating key Safeguarding messages.

**3.6** Three Survivors who are engaged with the Diocese provided feedback for this audit. They were unanimous in their praise for the work of the Safeguarding team, in particular the Victim/Survivor support lead and the Safeguarding Coordinator, and the support, direction and willingness to help that they provided. Some

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<sup>4</sup> [LOUDfence](#) LOUDfence UK is inspired by gospel values and aims to work with churches to actively foster a culture which is pro-safeguarding and truth telling

<sup>5</sup> [Home - First Light](#) A Charity for anyone experiencing, or having experienced, domestic abuse or sexual violence

members of the clergy were also praised for their engagement with Survivors, providing Pastoral support and care. Survivors can be, and are, signposted to local and national support organisations according to their individual need. The Diocesan strategy document, "Responding to Victims and Survivors of Abuse", has five strategic aims, one of which is engaging with Survivors in creating the Safeguarding provision provided by the Diocese. As part of this engagement two Survivors' groups have been established, one in person and one online, which will allow the Diocese to gain feedback to guide future improvements in practice and policy. Clergy and PSRs have also been offered in person training on being Trauma Informed. This will improve compassionate and caring responses to Survivors from those who have attended the training.

**3.7** Whilst there is an excellent provision for Survivors who are engaged with the Safeguarding team, knowledge of its existence was not universal among Survivors or clergy. Therefore, it will be important to continue to promote the provision to increase awareness and accessibility for any Survivors. Increasing clergy confidence in responding to disclosures was identified by the Area Deans as an area that needs ongoing training. Developing a process of routinely reflecting on potential learning from Survivors across the Safeguarding team, in the Safeguarding Subcommittee and for Trustees, will ensure that the commitment to engaging with Survivors to create the Safeguarding provision is met.

**3.8** The Diocese follow CSSA guidance with regard to Management of Concerns and Allegations<sup>6</sup>. Case audits demonstrated that, in relevant cases, liaison with statutory agencies is effective in managing risk, even across international borders. Systems are in place to ensure that, in addition to Survivors, Respondents to allegations are able to access Pastoral support. For cases involving clergy there is readily available access within the Diocese to expertise in Canon law to make sure that cases are investigated and managed in line with its stipulations. Case management also comes under scrutiny from the Safeguarding Subcommittee in the regular reports they receive for their meetings and through an internal case

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<sup>6</sup> [Practice Guidance \(catholicsafeguarding.org.uk\)](https://catholicsafeguarding.org.uk)

audit group. The Safeguarding Coordinator has regular case management oversight of the cases held within his team.

**3.9** Whilst case audits demonstrated some areas of good practice there were also areas where improvements should be made. On one occasion the CSSA regulatory requirements were not met because a Safeguarding Plan was agreed without an accompanying risk assessment to inform it. Case recording practice, in terms of timeliness and detail of recording, was regularly below expected practice standards. Actions arising from Safeguarding Subcommittee oversight should also be recorded in case management logs as a matter of course. One case audit demonstrated that there is a Diocesan Parish where the relationship between the Safeguarding team and the Parish Priest is poor and impinging upon effective practice. This matter has been raised to Trustees but remains unresolved.

**3.10** The Safeguarding team's professional backgrounds, experience and Continuous Professional Development mean that they are professionally competent to risk assess and manage individuals who pose a risk to others. Due to the competence of the Safeguarding team day to day liaison with the CSSA on case management is not necessary. However, where necessary on issues of national significance there is liaison. Clergy respondents would be able to nominate a fellow member of clergy to support them through any period where they were subject to a Safeguarding plan. Lay respondents can access Pastoral support through their Parish Priest who, along with PSRs and any involved statutory agencies, are always signatories to Safeguarding plans. In addition to Canon law advice, Respondents are signposted to criminal and/or civil legal advice. This was demonstrated in the case audits.

**3.11** Case audits demonstrated occasional slippage in reviewing Safeguarding plans past the expected 12 months, even with regular Safeguarding Coordinator oversight. Overdue reviews are reported to the Safeguarding Subcommittee, alongside a reason for their delay. Whilst clergy Respondents would receive support from the Diocese in the event of an allegation against them this has not been communicated sufficiently effectively for there to be widespread clergy awareness of, and confidence in, it. Remedying this would significantly reduce clergy anxiety about the impact of being made the Respondent to a Safeguarding concern.



**3.12** Curia staff and PSRs told us that they followed the expectations of the Safer Recruitment policy for employed staff and new volunteers across the Diocese. Performance data on clergy vetting and Safeguarding training is reported to the Safeguarding Subcommittee and Trustees. At the meeting in January 2024 it was reported that three clergy had a Disclosure and Barring Service (DBS)<sup>7</sup> check that was overdue by three months or more and all were actively engaged in updating their vetting so no additional action was needed. PSR compliance with vetting is also very near 100%. If clergy in active ministry were non-compliant with vetting and training expectations then their celebret<sup>8</sup> would be withheld. Newly arrived clergy in the Diocese, including those from overseas, participate in an inculturation process which includes input from the Safeguarding team to ensure they understand Diocese Safeguarding practice. The Safeguarding team are supported in their CPD to access relevant training for their roles, funded by the Diocese.

**3.13** The Diocesan complaints policy is being updated and remains in draft form and unavailable via the website. It should be ratified and published as soon as possible to allow individuals to understand how to effectively raise a complaint. Whilst overdue DBS renewals are chased prior to them being three months overdue they are not reported to the Safeguarding Subcommittee before this stage. The Diocese should consider if a proactive approach would enable the Subcommittee to be aware of, and address, any issues before they become overdue. They may also wish to contemplate if data for vetting and training of PSRs and eligible volunteers should make up part of the regular performance data provided.

**3.14** The training expectation of the Diocese is clear for clergy, employed staff and volunteers. For clergy, compliance is linked to the issuing of the celebret and for employed staff to successful completion of a probation period and annual appraisals. The Safeguarding team have a member of staff who leads on delivering face to face training provision, with subject matter based on his liaison with a local Community Safety Partnership. CSSA surveys of clergy and PSRs demonstrated that

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<sup>7</sup> [Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>8</sup> A "letter" of good standing so that the priest may exercise his ministry in a temporary way outside of the place where he normally conducts that ministry

there are high levels of compliance with Safeguarding training and that, in general, the quality of training is highly regarded.

**3.15** To ensure the quality of future training provision it will be important to reintroduce participant feedback mechanisms from the current sessions. Clergy also indicated that they would like the opportunity to be consulted on the content of future training sessions to be sure that it is meeting their needs. In line with the expectations of the Safeguarding standards the Diocese should also complete a Training Needs Analysis to ensure it understands its own training requirements and how they will be met.

**3.16** The Safeguarding Subcommittee reviews its SIP at every meeting and tracks related actions on an action tracker. Regular internal case audits are undertaken and practice in Parishes was audited in 2022. Survivors are planned to be increasingly involved in improvements made in Safeguarding practice within the Diocese in line with the commitment from “Responding to Victims and Survivors of Abuse”. Further transparency and accountability in Safeguarding practice is intended through the publication of an annual Safeguarding report which is currently in draft form.

**3.17** To provide ongoing confidence that Safeguarding practice at a Parish level is effective the Diocese should consider how often Parish Audits should be repeated. Formalising learning processes from concerns, allegations and complaints will make it more likely that Safeguarding practice continues to improve even if there are changes in personnel or key volunteers.

## 4. Recommendations

**4.1** To support improvement the following recommendations are made:

### Within three months

- Create a statement on the Diocesan website from a senior member of clergy supporting Safeguarding and a zero tolerance approach to abuse
- Promote the Diocesan Survivor provision as widely and frequently as possible
- Case Audit group to review casework practice against the CSSA Casework audit matrix to ensure regulatory practice standards are consistently met
- Complete a risk assessment in all existing cases where a Safeguarding plan has been agreed without an assessment of risk
- Trustees to review the work and communications between individuals in specific case audit contexts, and action as required
- Complaints policy to be ratified and published on the website
- Mechanisms to review the effectiveness of the training provision to be re-introduced

### 7.3 Within six months

- Formalise mechanisms to learn from concerns, allegations, complaints and Survivor engagement at all levels of the organisation
- Introduce measures to ensure the reviews of Safeguarding plans adhere to expected timescales
- Clergy to be issued guidance on the level and type of support they would receive in the event of an allegation against them
- Safeguarding Subcommittee to consider if proactive performance indicators are warranted and if performance data to include PSRs and volunteers is needed
- Safeguarding Subcommittee to decide how frequently Parish audits should be repeated
- Training lead to engage with clergy on the type of training to be provided to them
- Training Needs Analysis to be completed
- Annual Safeguarding Report to be published

#### **7.4 Within twelve months**

- Review the Safeguarding Implementation Plan to ensure it address all eight Safeguarding Standards of the Catholic Church in England and Wales
- Review the Safeguarding Communication Strategy after 12 months with feedback from key stakeholders to drive improvements
- Repeat training in receiving a disclosure for clergy and PSRs

#### **7.5 National Issue**

- Impact of extended period without a Bishop on Safeguarding practice

### **5. Arrangements for Follow-up**

**5.1** In accordance with the CSSA follow up pathway for dioceses achieving a grading of Results Being Achieved, the Catholic Diocese of Plymouth will be invited to submit its action plan arising from this audit and to attend six monthly conversations with the lead auditor to review progress. These will be supported by annual self-assessments of progress against the Safeguarding standards and an earliest re-audit date of November 2026 unless an earlier review is triggered by evidence of emerging Safeguarding risks.